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Subject Environmental Defense comments on Tetracycloxirane
(CAS# 7320-38-7)

(Submitted via Internet 6/7/06 to _____ and

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Environmental Defense appreciates this opportunity to submit comments on the **robust** summary/test plan for **Tetracycloxirane (CAS# 7320-38-7)**.

Arkema Inc., in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for tetracycloxirane, also known as **1,2-epoxyhexadecane**.

According to this submission, tetracycloxirane is produced at a single location and used as an isolated intermediate by a limited number of companies. Primary uses include the production of lubricants, surfactants, and additives for functional fluids for machinery, etc. Use of this chemical is said by the sponsor to involve "well-known technology". Although the processes in which it is used, the number of users, and the degree to which or manner by which it is transported are not described, the sponsor asserts that there is very low potential for exposure outside occupational settings.

This test plan provides a good summary of available studies. Most of the required **SIDS** elements appear to be adequately addressed by currently available studies. Additional work is proposed to determine the stability of tetracycloxirane in water and its toxicity to algae. Our review of studies as summarized in the test plan and robust summaries indicates that many are current and were conducted under GLP. Other studies are older and were not conducted under GLP, but appear adequate. The acceptability of this submission will hinge on EPA's acceptance of studies conducted, but not published, by the National Toxicology Program (NTP). Specifically, repeated dose and chronic studies were conducted and reviewed by the NTP, but not published, because of problems with a contract organization. Reproductive/developmental endpoints are also based on these studies. Descriptions of results of these studies are available to the public, (NTP unpublished study **C55538**), but the NTP makes no statement as to their reliability.

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In summary, it would be of interest to have more information on the production, transport and use of tetradecyloxirane and its potential for release into the environment, but we defer to EPA to determine the acceptability of this submission, which will be dependent upon its acceptance of the unpublished NTP studies.

Thank you for this opportunity to comment.

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